

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. :

LEONIDAS SIERRA, et al., :

Defendants. :

No. 11 Cr. 1032 (PAE)

**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE THAT**, upon the accompanying Memorandum of Law, dated May 29, 2012, defendant Nelson Jorge-Martinez, by and through his counsel, shall move this Court, before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, on June 5, 2012 at 2:15 PM, for an Order, pursuant to 18 U.S.C. § 3145(b), to revoke the Magistrate Judge's Detention Order, dated March 12, 2012 and granting Mr. Jorge-Martinez bail, and for such other relief as the Court deems just and proper. Counsel requests oral argument on this motion.

Dated: New York, New York  
May 29, 2012

Respectfully submitted,

/s/ Evan T. Barr  
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